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August 15, 2017

Alice Glasner
Energy Division
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

RE: Feedback on Joint Staff Proposal for SB 350 Disadvantaged Communities Advisory Group

Ms. Glasner:

As requested in your August 7th email, Peninsula Clean Energy Authority (PCE) submits these comments on the California Public Utilities Commission/California Energy Commission Joint Staff Proposal – Senate Bill 350 Disadvantaged Communities Advisory Group Structure and Framework (Joint Staff Proposal). We appreciate the opportunity to engage with staff at both commissions as they consider the form and structure of this advisory group required by Public Utilities Code Section 400(g).

PCE is a CCA formed in February 2016 to serve all of San Mateo County including all 20 incorporated cities within County. PCE completed enrollment of all customers in April 2017 and currently serves approximately 300,000 accounts. PCE is committed to serving all of these customers with fair rates and innovative program offerings. While San Mateo County is often considered a wealthy county, our residents are very diverse. For example, approximately 20% of residents speaking Spanish at home and approximately 17% of residents speaking an Asian language in their home. Moreover, the mean income of the bottom 20% of households in San Mateo County is approximately \$21,600. CalEnviroScreen 3.0 identifies disadvantaged communities in Daly City, South San Francisco and East Palo Alto and nearly 50,000 households are CARE-eligible within San Mateo County.

While PCE has just completed its enrollment, we have already embarked on a number of efforts to decrease the energy burden faced by our customers by lowering generation rates for all customers of PCE by approximately 5% off of PG&E's tariffed rates. This reduction in energy costs keeps approximately \$17 million dollars in the pockets of our customers. Moreover, PCE is establishing a rate stabilization fund to help ensure our customers do not face unexpected bill volatility. Longer term, PCE is exploring ways in which it can facilitate access to renewable energy and electric vehicles within our low-income communities.

Among the questions for comment are the subject area backgrounds that the Commission should seek out in prospective applicants or should Advisory Group members have specific roles. Given the

anticipated growth of CCAs and their commitment as public agencies to serving all of their customer base, PCE believes it is critical that at least one appointee to the advisory group be from a CCA or have a close working relationship with a CCA. This person could be a local elected official who serves on the board of a CCA, an experienced program manager from a CCA or a representative of a community-based organization that has a close working relationship with one or more CCAs. We believe this is an important perspective to include on the Advisory Group because CCAs are a uniquely flexible and nimble platform for delivering services to communities within their service territories. CCAs are public agencies that have deep connections to the areas they serve due to their public entity nature and their diverse boards of elected local officials. CCAs also have more flexibility in designing programs based on unique aspects of their community needs. As programs with unique features are implemented by CCAs to serve their low-income communities and prove successful, the lessons learned and best practices from these efforts could be shared within the Advisory Group by a representative with knowledge of CCAs.

PCE appreciates the opportunity to submit these comments. Please do not hesitate to contact me with any questions you have regarding the comments or to discuss them further. My telephone number is (650) 386-0125 and jwiedman@peninsulacleanenergy.com.

Regards,

Joseph Wiedman
Senior Regulatory/Legislative Analyst
Peninsula Clean Energy Authority